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Hearing: May 31, 2017 at 10 a.m.

Attorneys for Defendant

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff,

Plaintiff,

v.

BRUNO L. DI GIULIAN,

Defendant.

Adv. Pro. No. 10-04728 (SMB)

DECLARATION OF PATSY DIGIULIAN

I, PATSY DIGIULIAN, declare pursuant to 28 U.S.C. § 1746, that the following is true based upon my personal knowledge:

1. I am the widow of Bruno DiGiulian, who died on December 6, 2015.
2. Bruno and I lived in Florida throughout our married life, where Bruno practiced law.
3. After Bruno's death, no probate proceeding was filed in Florida because there were no assets in Bruno's estate. However, in early 2017, the Trustee filed a Statement of Claim against Bruno's estate, which forced the opening of a probate proceeding in Broward County, Florida.
4. Bruno's IRA account was 100% invested in Madoff.
5. Each year Bruno withdrew funds from his IRA account which he used for daily living expenses.
6. When Madoff confessed, Bruno's IRA account had no value.

May 22, 2017

/s/ Patsy DiGiulian
Patsy DiGiulian